REMARKS/ARGUMENTS

Claims 1, 4-12, 15-18, 21-30, 33-35, and 36-37 are pending upon entry of this amendment.

Claims 1, 11, 18, and 28 have been amended. No new matter has been added by the claim amendments.

Claims 1, 11-12, 18, 28-30, and 33 are rejected under 35 U.S.C. § 102(a) as being anticipated by US Patent No. 6,785,675 to Graves et al. ("Graves").

Claims 4-6, 15, and 21-23 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Graves in view of US Patent No. 7,165,166 to Grove et al. ("Grove").

Claims 7-10, 16-17,and 24-27 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Graves and Grove and further in view of US Patent Application Publication No. 2002/0040414 to Uehara ("Uehara") and US Patent Application Publication No. 2003/0138091 to Meek et al. ("Meek").

Claims 34-35 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Graves in view of US Patent Application Publication No. 2002/0010798 to Ben-Shaul et al. ("Den-Shaul").

Reconsideration of the rejection is requested based on the comments below.

Examiner Interview

Applicants thank the Examiner for the helpful interview conducted on October 13, 2009. Interview participants were Applicant's representatives Girish Basarkar and Craig Largent and Examiner Rayyan. Applicant's representatives presented arguments for allowability of claims 1 and 28 over the Graves reference. Examiner Rayyan explained her reasons for the rejection. Alternative claim language was proposed by the Applicant's representatives, however, no agreement was reached. The substance of the discussion with the Examiner is reflected in the claim amendments and comments below.

Rejection under 35 U.S.C. § 102

Applicants submit that Graves does not disclose one or more of the features recited in claim 1. For example, claim 1 recites:

creating a first request message including the plurality of queries
and a first sequence number associated with the plurality of queries,
among other elements.

As recited in claim 1, a request message is created which includes a plurality of queries. A sequence number is also created and associated with the plurality of queries. Applicants have reproduced Fig. 2 of the present application below, for reference.
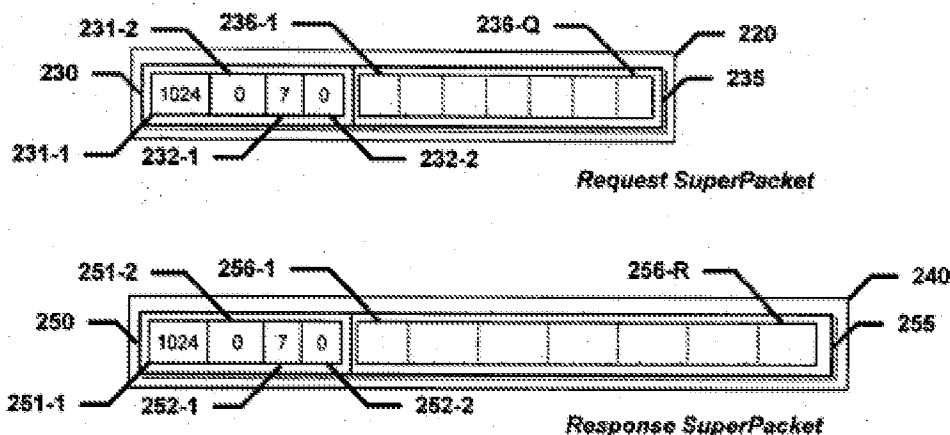

FIG. 2

As illustrated in Fig. 2 above, the request message 220 has a plurality of queries 236-1 to 236-Q included in it. The system generates a sequence number 231-1, e.g., 1024, and associates that sequence number to the plurality of queries.

Applicants submit that Graves does not disclose at least this feature of claim 1. Graves is generally directed at aggregating resource requests from multiple individual requestors. The cited section of Graves describes combining requests for checking account balances on three different accounts into a single query. The numbers 111, 222, and 333 are the *account numbers* whose balances are to be checked. These account numbers are included as parameters in each query in order to obtain the balance information. The server aggregates the three queries and sends them to database management system. Applicants submit that the aggregated query in Graves *does not* have a sequence number that is associated with a plurality of queries within the

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aggregated query. (See Graves, col 4 lines 36-39). Each account number is part of a single query and is not associated with multiple queries. Applicants submit that the account number is an *integral part* of the individual query and is not a sequence number that is associated with a plurality of queries, as recited in claim 1.

Claim 1 further recites:

> . . . receiving a response message from the search engine, the response message including a plurality of replies and the first sequence number, wherein the first sequence number is associated with the plurality of replies;. . .

Referring back to Fig. 2, the response message 240 has a plurality of replies 256-1 to 256-R included in the response message. The same sequence number 251-1, e.g., 1024, is associated with the plurality of queries in the response message 240.

As discussed above, Graves does not teach a sequence number associated with a plurality of queries included in an aggregated query. Similarly, the replies to the individual queries included in the response received from the database management system in Graves also do not have a sequence number associated with it. As best understood, the response from the database management system in Graves is in form of a table in which "rows are matched to pending call parameters [account numbers]." (Graves at col 4, lines 52-54). The reply from the database management system merely indicates the balance for each of the account numbers requested. The account numbers are an integral part of the reply. The *account number* included in a reply is not associated with a plurality of replies, but rather is *part of a single reply*. Applicants submit that there is no disclosure in Graves to support the assertion that the response message includes "the first sequence number, wherein the first sequence number is associated with the plurality of replies", at least as recited in claim 1.

Thus, Applicants submit that claim 1 cannot be considered anticipated by Graves and is allowable over Graves for at least the reasons stated above. Claims 4-10 and 28-37, which depend on claim 1, are also in condition for allowance for at least the reasons stated above and for the additional elements that they recite.

The dependent claims are allowable for additional reasons. For example, claim 28 recites:

> 28.   The method of claim 1, further comprising:
>   creating a second request message including a plurality of queries;
>   sending the second request message to a search engine; and
>   receiving a response message from the search engine, wherein the response message includes one or more replies generated in response to the first request message and one or more replies generated in response to the second request message, and wherein the second request message is created after the first request message.

As recited in claim 28, a second request message is generated that includes a plurality of queries. The second request message is also sent to the search engine. The response message from the search engine includes a plurality of replies that are generated in response to the first request message and the second request message. Thus, a single response message includes responses to two different request messages.

Applicants submit that Graves does not disclose this feature of claim 28. As discussed in relation to claim 1, the cited section of Graves discloses a reply message for an aggregated query. The aggregated query in Graves includes individual queries. The reply message corresponds to the aggregated query in that it includes replies to the individual queries that were part of the aggregated query. As best understood, each reply message in Graves is in response to a single aggregated query. Applicants submit that there is no disclosure in Graves about the response message including replies to queries from *two* different aggregated messages.

Applicants further submit that the individual query that is included in the aggregated query is *not* analogous to the request message recited in claim 28, as the Office Action seems to suggest. The first request message and second request message, recited in claim 28, each include a plurality of queries. The individual query disclosed in Graves is not the same as the request message recited in claim 28 since the individual query in Graves does not include a plurality of queries. Thus, Applicants submit that Graves does not disclose the features of claim 28. Hence, claim 28 is allowable over Graves for these additional reasons.

Claims 11 and 18 recite features similar to those discussed above with respect to claim 1 and, therefore, are allowable over Graves for at least a similar rationale as discussed for claim 1 above. Claims 12, 15-17, and 21-27, which depend on claims 11 and 18, respectively, are also in condition for allowance for at least the reasons stated above and for the additional elements that they recite.

Rejection under 35 U.S.C. § 103

As stated above, independent claims 1, 11, and 18 are in condition for allowance. Hence, Applicants submit that all dependent claims that depend from claims 1, 11, and 18, respectively, are also in condition for allowance.

CONCLUSION

In view of the foregoing, Applicants believe all claims now pending in this Application are in condition for allowance. The issuance of a formal Notice of Allowance at an early date is respectfully requested.

If the Examiner believes a telephone conference would expedite prosecution of this application, please telephone the undersigned at 650-326-2400.

Respectfully submitted,

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